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Attorney for Creditor,
U.S. BANK TRUST NATIONAL ASSOCIATION, AS TRUSTEE OF THE IGLOO SERIES III TRUST,
its successors and assigns

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE: § CASE NO.: 16-44770-mxm13
§
CILFREDO GARCES, JR. AND TRACIE MARIE §
GARCES § CHAPTER 13
§
DEBTORS, §
§
U.S. BANK TRUST NATIONAL ASSOCIATION, §
AS TRUSTEE OF THE IGLOO SERIES III §
TRUST CREDITOR, §
§

**RESPONSE TO NOTICE TO DEEM MORTGAGE CURRENT OR, ALTERNATIVELY,
NOTICE OF AMOUNT DEEMED NECESSARY TO CURE**

TO ALL PARTIES IN INTEREST AND TO THEIR ATTORNEYS OF RECORD:

U.S. BANK TRUST NATIONAL ASSOCIATION, AS TRUSTEE OF THE IGLOO SERIES III
TRUST, (“Secured Creditor”) in the above-entitled Bankruptcy proceeding, hereby submits the
following reply to Notice to Deem Mortgage Current or, Alternatively, Notice of Amount Deemed
Necessary to Cure (“Notice”) filed on May 15, 2018, by the Chapter 13 Trustee, Pam Bassel.

Secured Creditor is entitled to receive payments pursuant to a Promissory Note which matures on April 1, 2031 and is secured by a Deed of Trust on the subject property commonly known as 120 Private Road 3387, Paradise, TX 76073 (the “**Property**”).

Secured Creditor disagrees that the amount remaining necessary to cure and pre-petition home was paid in full and that a total of \$19,605.64 remains in arreage.

Secured Creditor does not agree that the Debtor, is current post-petition. The Debtor is due for the March 1, 2018 post-petition monthly mortgage payment and all subsequent payments for a total post-petition default as follows:

Date	Payment Amount
05/01/2017	\$1,376.77
06/01/2017	\$1,376.77
07/01/2017	\$1,376.77
08/01/2017	\$1,376.77
09/01/2017	\$1,376.77
10/01/2017	\$1,376.77
11/01/2017	\$1,376.77
12/01/2017	\$1,376.77
01/01/2018	\$1,376.77
02/01/2018	\$1,376.77
03/01/2018	\$1,376.77
04/01/2018	\$1,376.77
05/01/2018	\$1,376.77
06/01/2018	\$1,376.77
07/01/2018	\$1,376.77
Total	\$20,651.55

A true and correct copy of the post-petition mortgage payment history is attached hereto as **Exhibit “A”**.

Respectfully submitted,

/S/ KRISTIN A. ZILBERSTEIN

Kristin A. Zilberstein, Esq.

State Bar No.: 24104960

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COUNSEL FOR SECURED CREDITOR



Loan Information	
Loan #	
Borrower	Cilfredo Garces
BK Case #	16-44770
Date Filed	12/4/2016
First Post Petition	
Due Date	1/1/2017
POC Covers	8/1/15 - 12/7/16

Trustee Pay-A

Payment Changes				
Date	P&I	Escrow	Total	Notice Filed
1/1/2017	\$891.94	\$484.83	\$1,376.77	Filed w/ POC NOPC

Jennifer R. Bergh, Esq. (SBN 24103791)
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6 Attorney for Creditor
7 U.S. Bank Trust National Association, as Trustee of the Igloo Series III Trust

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF TEXAS – FT. WORTH DIVISION

CERTIFICATE OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of eighteen and not a party to the within action. My business address is: 1920 Old Tustin Avenue, Santa Ana, CA 92705.

I am readily familiar with the business's practice for collection and processing of correspondence for mailing with the United States Postal Service; such correspondence would be deposited with the United States Postal Service the same day of deposit in the ordinary course of business.

1 | On July 12, 2018 I served the following documents described as:

- **RESPONSE TO NOTICE TO DEEM MORTGAGE CURRENT OR, ALTERNATIVELY, NOTICE OF AMOUNT DEEMED NECESSARY TO CURE**

5 on the interested parties in this action by placing a true and correct copy thereof in a sealed
6 envelope addressed as follows:

7 (Via United States Mail)

8	Debtor		Chapter 13 Trustee	
9	Clifredo Garces, Jr.		Pam Bassel	
0	120 Private Road 3387		7001 Blvd. 26	
1	Paradise, TX 76073		Suite 150	
2				North Richland Hills, TX 76180
3				
4	Consolidated Debtor		U.S. Trustee	
5	Tracie Marie Garces		United States Trustee	
6	120 Private Road 3387		1100 Commerce Street, Room 976	
7	Paradise, TX 76073		Dallas, TX 75242	

8 xx (By First Class Mail) At my business address, I placed such envelope for deposit with
9 the United States Postal Service by placing them for collection and mailing on that date
 following ordinary business practices.

____ Via Electronic Mail pursuant to the requirements of the Local Bankruptcy Rules of the Eastern District of California

xx (Federal) I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

24 Executed on July 12, 2018 at Santa Ana, California

/s / Ariel Del Pinto
Ariel Del Pinto